

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
(ray.schrock@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER & BENVENUTTI LLP

Tobias S. Keller (#151445)
(tkeller@kellerbenvenutti.com)
Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND AD HOC GROUP OF
SUBROGATION CLAIM HOLDERS
EXTENDING TIME TO RESPOND TO
DEBTORS' BAR DATE MOTION AND
MOTION OF THE AD HOC GROUP OF
SUBROGATION CLAIM HOLDERS FOR
ENTRY OF AN ORDER APPROVING
PROPOSED MODEL OMNIBUS
INSURANCE SUBROGATION PROOF
OF CLAIM FORM FOR SUBROGATION
CLAIMS AND RELATED PROCEDURES**
Re: Dkt. Nos. 1784, 2044

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Ad Hoc Group of
4 Subrogation Claim Holders (the “**Ad Hoc Subrogation Group**”), on the other hand. The
5 Debtors and the Ad Hoc Subrogation Group are referred to in this Stipulation and Agreement for
6 Order collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and
7 agree as follows:

8 **RECITALS**

9 A. On May 1, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C.*
10 *§§ 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and L.B.R. 3003-1*
11 *for Order (I) Establishing Deadline for Filing Proofs of Claim, (II) Establishing the Form and*
12 *Manner of Notice Thereof, and (III) Approving Procedures for Providing Notice of Bar Date and*
13 *Other Information to All Creditors and Potential Creditors* [Dkt. No. 1784] (the “**Bar Date**
14 **Motion**”), which is set for a hearing before the Court at 9:30 a.m. on June 11, 2019. Any
15 response or opposition to the Bar Date Motion is due by 4:00 p.m. (Pacific Time) on May 28,
16 2019.

17 B. On May 16, 2019, the Ad Hoc Subrogation Group filed the *Motion of the Ad Hoc*
18 *Group of Subrogation Claim Holders Pursuant to 11 U.S.C. § 105(a), 107(b) and 501 and Fed.*
19 *R. Bankr. P. 3001(a) and 9018 for Entry of an Order Approving Proposed Model Omnibus*
20 *Insurance Subrogation Proof of Claim Form for Subrogation Claims and Related Procedures*
21 [Dkt. No. 2044] (the “**Subrogation Claim Form Motion**”), which is set for a hearing before the
22 Court at 9:30 a.m. on June 11, 2019. Any response or opposition to the Subrogation Claim Form
23 Motion is due by 4:00 p.m. (Pacific Time) on May 28, 2019.

24 C. Counsel for the Debtors and counsel for the Ad Hoc Subrogation Group have
25 agreed that the time for the Ad Hoc Subrogation Group to respond to the Bar Date Motion and
26 the time for the Debtors to respond to the Subrogation Claim Form Motion be extended.
27
28

1 NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE
2 INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS
3 STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE
4 UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,
5 THAT:

6 1. The time for the Ad Hoc Subrogation Group to file and serve any response or
7 opposition to the Bar Date Motion is extended through 4:00 p.m. (Pacific Time) on May 31, 2019.

8 2. The time for the Debtors file and serve any response or opposition to the
9 Subrogation Claim Form Motion is extended through 4:00 p.m. (Pacific Time) on May 31, 2019.

10 Dated: May 28, 2019

Dated: May 28, 2019

11 KELLER & BENVENUTTI LLP

DIEMER & WEI LLP

12 /s/ Jane Kim
Jane Kim

/s/ Alexander Lewicki
Alexander Lewicki

13 *Attorneys for Debtors*
14 *and Debtors in Possession*

Attorneys for Ad Hoc Group of Subrogation
Claim Holders